

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

Gates Community Chapel of Rochester, Inc.
d/b/a Freedom Village USA
d/b/a Operation Mercy

CHAPTER 11

Debtor.

BK No.: 18-20169

**RESPONSE TO LIMITED OBJECTION BY THE UNITED STATES TRUSTEE TO AN
ORDER AUTHORIZING THE EMPLOYMENT OF GALVIN REALTY GROUP, INC.
AS REAL ESTATE BROKER**

The Debtor-in-Possession, Gates Community Chapel of Rochester, Inc. (the “Debtor”) by and through its counsel, Dibble & Miller, P.C., and in support of its Application for an Order authorizing the employment of Galvin Realty Group, Inc. (the “Broker”), in accordance with 11 U.S.C. §§ 327 and 328, and Fed. R. Bankr. P. 2014, as the Debtor’s real estate broker for the sale of some real property located in and around Yates County, State of New York, responds to the limited objection by the United States Trustee as follows:

1. The Debtor intends to market for sale with the proposed Relator the following real property parcels (or portion thereof):
 - a) 127 East Fourth St., Watkins Glen, NY 14891; specifically the church building with pipe organ & stained glass. Property Tax ID: 65.54-1-29 (Schuyler County)
 - b) Portion of 5275 NY Route 14, Lakemont, NY 14857; specifically approximately 1,167 feet of Seneca Lake frontage including approximately 42 acres (not including main campus and buildings). Property Tax ID: 121.02-1-58 (Yates County)
 - c) 6053 NY Route 14, Rock Stream, NY 14878; specifically approximately 1 Acre with single family house. Property Tax ID: 131.02-1-28 (Yates County)

- d) Portion of 4999 Lakemont-Himrod Rd., Lakemont, NY 14857; specifically 33.30 Acres (not including single family house). Property Tax ID: 121.02-1-24 (Yates County)
- e) 5065 Lakemont-Himrod Rd., Lakemont, NY 14857; specifically approximately .15 Acre with single family house. Property Tax ID: 121.02-1-29 (Yates County)
- f) 5612 NY Route 14, Lakemont, NY 14857; specifically approximately 1.40 Acres with single family house. Property Tax ID: 128.04-1-2 (Yates County)
- g) Portion of 586 Rock Stream Rd., Rock Stream, NY 14878; specifically approximately 75.00 Acres (not including single family house). Property Tax ID: 131.01-1-16 (Yates County)
- h) Portion of 625 & 638 Rock Stream Rd., Rock Stream, NY 14878; specifically approximately 285.56 Acres (not including single family house). Property Tax ID: 130.04-1-9 (Yates County)

WHEREFORE, the Debtor respectfully requests that this Court grant the relief requested herein, and for such other and further relief as is just and proper.

Dated: April 19, 2018

Dibble & Miller, P.C.

BY: /s/ Mike Krueger, Esq.
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